

# EXHIBIT E

## IN SUPPORT OF ROOT'S MOTION FOR CONTEMPT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>Root, Inc., et al.,</b>	:	<b>Case No. 2:23-cv-512</b>
	:	
<b><i>Plaintiffs,</i></b>	:	<b>Judge Sarah D. Morrison</b>
	:	
<b>v.</b>	:	<b>Magistrate Judge Chelsey M. Vascura</b>
	:	
<b>Silver, et al.,</b>	:	
	:	
<b><i>Defendants.</i></b>	:	

**DECLARATION OF GRACE E. SAALMAN**

I, Grace E. Saalman, hereby declare as follows on the basis of my personal knowledge:

1. I am an attorney at the law firm Vorys, Sater, Seymour and Pease, LLP (“Vorys”). I have personal knowledge of all of the facts set forth herein, and if called as a witness under oath, I could and would competently testify thereto.

2. Along with my colleagues William D. Kloss, Jr. and Elizabeth S. Alexander, I am counsel of record for Plaintiffs Root, Inc., Caret Holdings, Inc., and Root Insurance Agency, LLC (collectively, “Plaintiffs” or “Root”) in the above-referenced matter.

3. I submit this Declaration in support of Plaintiffs’ Motion for Contempt (the “Motion”).

4. On April 4, 2023, on behalf of Root, Vorys served subpoenas on Bank of America, N.A. (“Bank of America”) seeking account records and monthly statements for any accounts associated with or under the control of Brinson Caleb “BC” Silver or Collateral Damage, LLC (“Collateral Damage”) from February 15, 2023 to present (the “Subpoenas”).

5. On April 17, 2023, Vorys received a production of documents from Bank of America in response to the Subpoenas. The production included February and March 2023

monthly statements for accounts controlled by Silver, Collateral Damage, and Eclipse Home Design, LLC. Portions of the account statements are attached to the Motion as **Exhibits A, B, and C**. Vorys also received a Declaration of Bank of America Bank Officer and/or Custodian of Records from Bank of America, attached to the Motion as **Exhibit D**.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd day of May 2023 in Columbus, Ohio.

*/s/ Grace E. Saalman*

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Grace E. Saalman